

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

UNITED STATES OF AMERICA,	)		
	)		
Plaintiff,	)		
	)		
v.	)		
	)		
DANIELLE L. DOWLING,	)	NO. 1:20-cr-0097-JRS-DLP	-01
a/k/a Dee,	)		
LINDA L. BOW,	)		-02
JOSH STOOPS,	)		-03
JAMES BACON,	)		-04
a/k/a Jay,	)		
MICHEAL FISHER,	)		-05
STEVE ANDERSON,	)		-06
a/k/a Crook,	)		
JAMES SWARTZ,	)		-07
ERIC POORE,	)		-08
a/k/a Hollywood,	)		
JANNA BROADDUS,	)		-09
JOSH T. UNGER,	)		-10
a/k/a J.T.,	)		
RYAN SAWYERS,	)		-11
a/k/a Ogre,	)		
TROY THORNTON,	)		-12
a/k/a Capone,	)		
DARIUS ANTHONY GARCIA,	)		-13
a/k/a Roger,	)		
AMBER L. SEATS	)		-14
JEREMY OSMON,	)		-15
TYLER GREENWALT,	)		-16
GUY KARNES,	)		-17
CLIFFORD R. KING, JR.,	)		-18
a/k/a Zoe,	)		
LISA ROTH,	)		-19
ERIC WALKER,	)		-20
a/k/a Little E,	)		
DYLAN WILLIAMS,	)		-21
a/k/a D,	)		
JEFFREY SACKS, and	)		-22
PAULA ADAMS,	)		-23
	)		
Defendants,	)		

**AGREED ENTRY CLARIFYING DISCOVERY PROCEDURE AND  
STATUS OF DISCOVERY ATTORNEY**

Comes now the United States of America, by counsel, Josh J. Minkler, United States Attorney, and Bradley A. Blackington, Assistant United States Attorney, and come now the defendants herein, by counsel, and submit the following Agreed Entry for the purpose of clarifying the discovery procedure herein and the role of the discovery attorney:

1. On March 17, 2020, a grand jury in the Southern District of Indiana returned an Indictment against the above-captioned defendants.

(Dkt. 1.)

2. On April 15, 2020, the Court granted the government's Motion to Establish a Discovery Schedule, Continue Trial Date, and Grant Protective Order. (Dkt. 251.)

This Order established a discovery schedule in this case and imposed a protective order upon prospective discovery material that the government would provide to defense counsel in this case. (*Id.*)

3. On May 12, 2020, the Court granted the defendants' ex parte Motion for Appointment of a Discovery Attorney and appointed attorney Russell M. Aoki as a coordinating discovery attorney to assist defense counsel in the receipt and management of discovery provided and to be provided by the government. [Dkt. 264]

4. The parties agree that all discovery, except that pertaining specifically to individual defendants, shall be provided by the government directly to Mr. Aoki and not to individual defense counsel. The government may provide a single copy of the discovery to Mr. Aoki, who shall be responsible for providing discovery to defense counsel.

Discovery pertaining to individual defendants and not immediately discoverable by the remaining defendants shall be provided by the government to individual defense counsel pursuant to the schedule established in the Court's Order of April 15, 2020 [Dkt. 251] and in accordance with future orders of the Court.

5. The parties agree that Attorney Aoki and his staff are covered by the existing Protective Order as "agents of defense counsel." (Dkt. 251, at 3]

Respectfully submitted,

JOSH J. MINKLER  
UNITED STATES ATTORNEY

*s/Bradley A. Blackington*

By:

\_\_\_\_\_  
Bradley A. Blackington  
Assistant United States Attorney

Gwendolyn M. Beitz  
Gwendolyn M. Beitz  
Indiana Federal Community Defenders, Inc.  
111 Monument Circle, Ste. 3200  
Indianapolis, IN 46204-5172  
(317) 383-3520  
For all defendants

CERTIFICATE OF SERVICE

I hereby certify that on **May 21, 2020**, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*s/Bradley A. Blackington*

---

Bradley A. Blackington  
United States Attorney's Office  
10 W. Market St., Suite 2100  
Indianapolis, IN 46204  
Phone: (317) 226-6333  
Fax: (317) 226-6125  
E-mail: [bradley.blackington@usdoj.gov](mailto:bradley.blackington@usdoj.gov)

Gwendolyn M. Beitz  
Gwendolyn M. Beitz  
For all defendants